

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

PRC ACQUISITION, LLC,	Bankruptcy No. 19-23923-GLT
Debtor,	Chapter 11
ENTERPRISE BANK,	Doc. No.
Movant,	Related to Doc. Nos. 42 & 48
vs.	Hearing Date and Time: January 9, 2020 at 10:00 a.m.
PRC ACQUISITION, LLC,	
Respondent.	

SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE

AND NOW, comes PRC Acquisition, LLC, the Debtor in the above Chapter 11 Case, by and through its Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl and files this **SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE** as follows:

1. The Debtor has signed an application for property insurance in the amount of \$4,650,000.00.
2. The Debtor has signed an application for general liability insurance along with a commercial umbrella policy for a collective coverage amount of \$5,000,000.00.
3. The principal of the Debtor, Yakub Mahomed provided the funding for the necessary premiums. Said funds were wired to the undersigned who then wired them to the Skena Insurance Agency on January 3, 2020.

4. An email from Chad Skena, the owner of the Skena Insurance Company is attached hereto as **Exhibit A**. Said email reflects that the Debtor will have coverage today.

5. For the reasons set forth herein and in the Debtor's Response to Enterprise Bank's Motion to Dismiss filed at Doc. No. 42, it is respectfully requested that this Honorable Court enter an Order denying the Motion to Dismiss or Convert Case.

Respectfully Submitted,

Date: January 8, 2020

/s/ Robert O Lampl _____
ROBERT O LAMPL
PA I.D. 19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
PA I.D. #319213
SY O. LAMPL
PA I.D. # 324741
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl hereby certify, that on the 8th day of January, 2020, a true and correct copy of the foregoing **SUPPLEMENTAL RESPONSE TO MOTION TO DISMISS OR CONVERT CASE** was served upon the following (*via electronic service*):

Norma Hildenbrand
Office of the United states Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

William M. Buchanan
Burns White LLC
48 26th Street
Pittsburgh, PA 15222
wmbuchanan@burnswhite.com

Date: January 8, 2020

/s/ Robert O Lampl

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